

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TONGLI SHIPPING CO. LTD.,

Plaintiff,

-against-

SEOUL MARINE SERVICE CO. LTD. and SMS
INVESTMENT CO. S.A.,

Defendants.

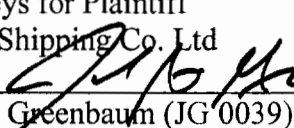
06 Civ.13459 (VM)

**NOTICE OF MOTION FOR DEFAULT
JUDGMENT AGAINST SEOUL MARINE
SERVICE CO. LTD. and
SMS INVESTMENT CO. S.A.**

PLEASE TAKE NOTICE that upon the affidavit of Jack A. Greenbaum, sworn to on October 17, 2007, and all prior pleadings and papers on file in this action, and pursuant to F.R.Civ.P. Rule 55, plaintiff Tongli Shipping Co. Ltd., will move before the Honorable Victor Marrero on the 16th day of November, 2007 for a default judgment against Seoul Marine Service Co. Ltd. and SMS Investment Co. S.A.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 6.1 of the Civil Rules of this Court, all opposing affidavits and answering memoranda shall be served on or before November 5, 2007.

Dated: New York, New York
October 17, 2007

BLANK ROME, LLP
Attorneys for Plaintiff
Tongli Shipping Co. Ltd
By: 
Jack A. Greenbaum (JG 0039)
The Chrysler Building
405 Lexington Ave.
New York, NY 10174-0208
(212) 885-5000

TO: Seoul Marine Service Co. Ltd. and SMS Investment Co. S.A.
Rm 1501 Jeil Bldg., 256-13
Gonduk-Dong
Mapo-Gu
Seoul, Korea 121-758